

SUPPLEMENTAL PROPOSAL

Channel 274A at Roxton, Texas, was included in all of Sullins channel studies and calculations. However, the original petitioner withdrew its expressions of interest in an allocation at Roxton. In addition, a counterproposal was filed seeking the substitution of channel 255A for channel 274A at Roxton. The substitution of channel 255A, or the allotment of no channel, gives Sullins more antenna site choices, but the allotment of channel 273C3 at Whitesboro is not conditioned on any deletions at Roxton.

Sullins proposes that the Commission give full consideration to the denial of any channel at Roxton since there is no expression of interest, but if one is allotted, channel 255A should receive the allotment. To support this request, Sullins submits a channel study for channel 255A at Roxton. It depicts that when a site restriction of 7.81 kilometers is used, channel 255A can be used for allotment at Roxton. See Exhibit E, figure 9. Exhibit E, figure 10 is a MAPINFO generated map depicting the reference coordinates and 70 dBu relationship to the Roxton community boundaries.

Sullins proposes this substitution to allow greater flexibility in securing antenna sites only.

No discussion is offered for the comparisons of the pending KMAD one-step application site gain/loss areas. Sullins will seek a new transmitter site for channel 273C2

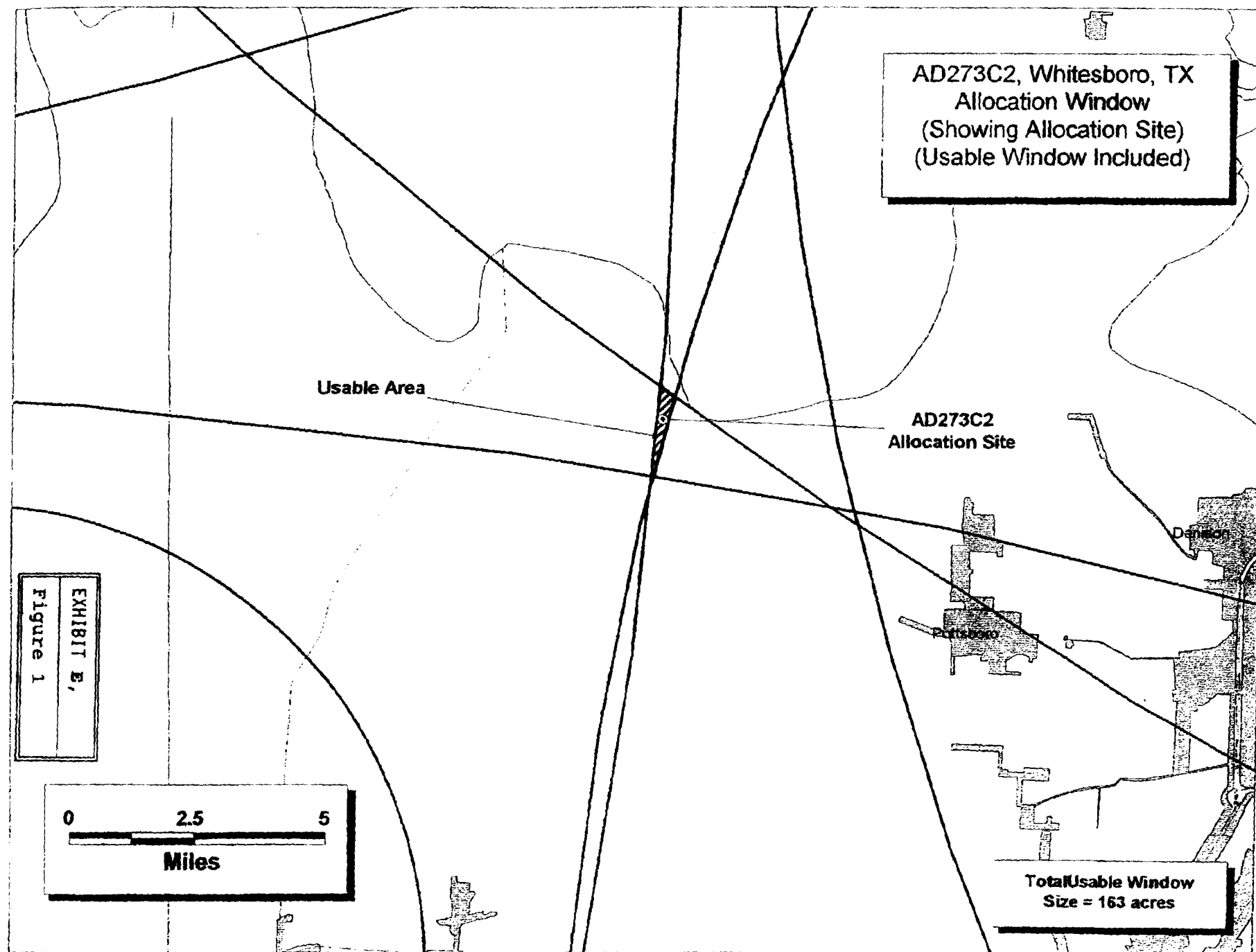
after the adoption of his instant request among the site options available.

REMAINING SERVICES

Finally, even though the loss area created by the Sullins counterproposal is small, a remaining services study was performed to demonstrate no white or grey area would be created. Secondly, the study demonstrates that more than 5 services remain. AM stations were projected using their .5 mV/m daytime contour and FM stations using a 60 dBu contour. See Exhibit E, figure 11.

CONCLUSION

The instant Sullins counter proposal is superior to the Grayson petition. The Sullins Counterproposal provides a first local service to a larger community of license (Whitesboro vs Pottsboro), more square kilometers served (by 1,712 sq km) and a new 60 dBu service to more persons (by 47,815 persons).



ENGINEERING STATEMENT

In support of a
COUNTERPROPOSAL
Pottsboro, Texas
MM Docket 98-7, RM-9209
Robert S. Sullins

EXHIBIT E,

Figure 2

KMAD AD 273C2 ALLOCATION STUDY

[DEPICTING SPACING TO ALL KNOWN FM FACILITIES & NECESSARY CHANGES FOR THE
INSTANT ALLOTMENT]
(USING KMAD PENDING ONE-STEP APPLICATION SITE AS REFERENCE)

33 49 29 N. Class C2 Search Date
96 46 44 W. Current rules spacings 06-24-98
Channel 273 -102.5 MHz

Call	Ch#	City	State	Bear'	Dist'	R'qrd	Margin
------	-----	------	-------	-------	-------	-------	--------

Community of Whitesboro

TX 212.2 21.66

Reference Coordinates:

North Latitude: 33-39-34

West Longitude: 96-54-12

ALOPEN 273C2 Madill

OK 0.0 0.00 190.0 -190.00 *

KMADFM 273C2 Madill

OK 0.7 12.11 190.0 -177.89 *

Of No Concern

Pending "one-step" Upgrade

of Petitioner

AD273 273C3 Pottsboro

TX 120.4 11.51 177.0 -165.49 *

Of Concern

MX with Instant Counterproposal

AD273 273A Madill

OK 0.7 31.27 166.0 -134.73 *

DE273 273A Madill

OK 0.7 31.27 166.0 -134.73 *

KMADFM 272A Madill

OK 0.7 31.27 106.0 -74.73 *

DE272 272A Madill

OK 0.7 31.27 106.0 -74.73 *

Of No Concern

Licensed Facility of Petitioner

AD274 274A Soper

OK 77.1 102.82 106.0 -3.18 *

Of Concern

Substitution of Ch 243A Proposed

Petitioner Filed Comments in MM Docket 98-7

to Change Reference Coordinates to a Site

Which Gives Full Spacing (See Comments of

Robert Sullins)

AD274 274A Roxton

TX 104.4 105.71 106.0 -0.29 *

DE274 274A Roxton

TX 104.4 105.71 106.0 -0.29 *

KQXC 273A Wichita Falls

TX 274.5 166.08 166.0 0.08 *

KCES.C 273C3 Eufaula

OK 37.0 177.57 177.0 0.57 *

KBRQ 273C1 Hillsboro

TX 189.1 224.64 224.0 0.64 *

KPFC.C 220A Callisburg

TX 231.7 27.74 15.0 12.74

KJYO 274C Oklahoma City

OK 341.1 201.99 188.0 13.99

ALOPEN 276C2 Atoka

OK 44.4 84.87 58.0 26.87

KKENFM 272A Duncan

OK 304.8 133.54 106.0 27.54

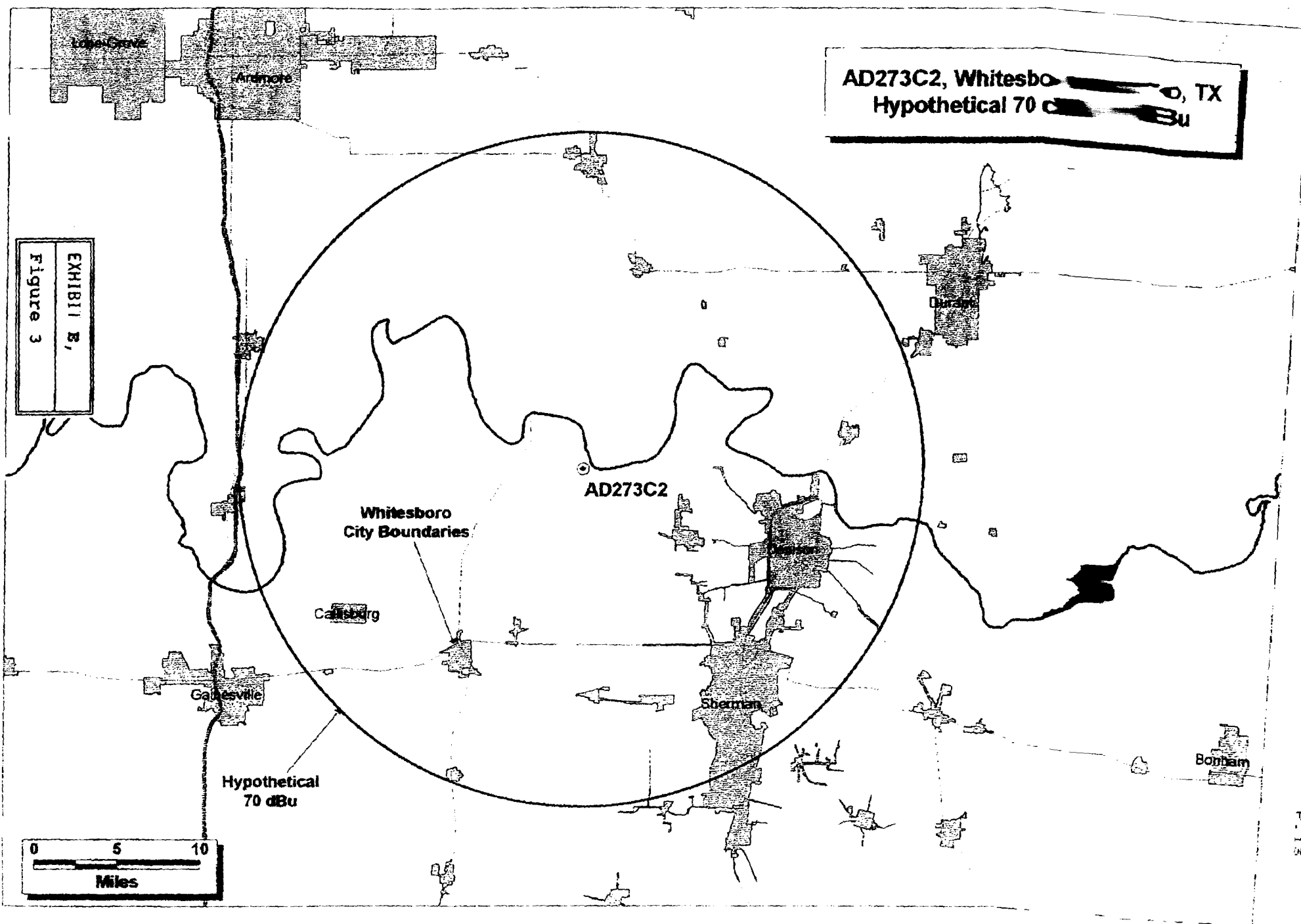
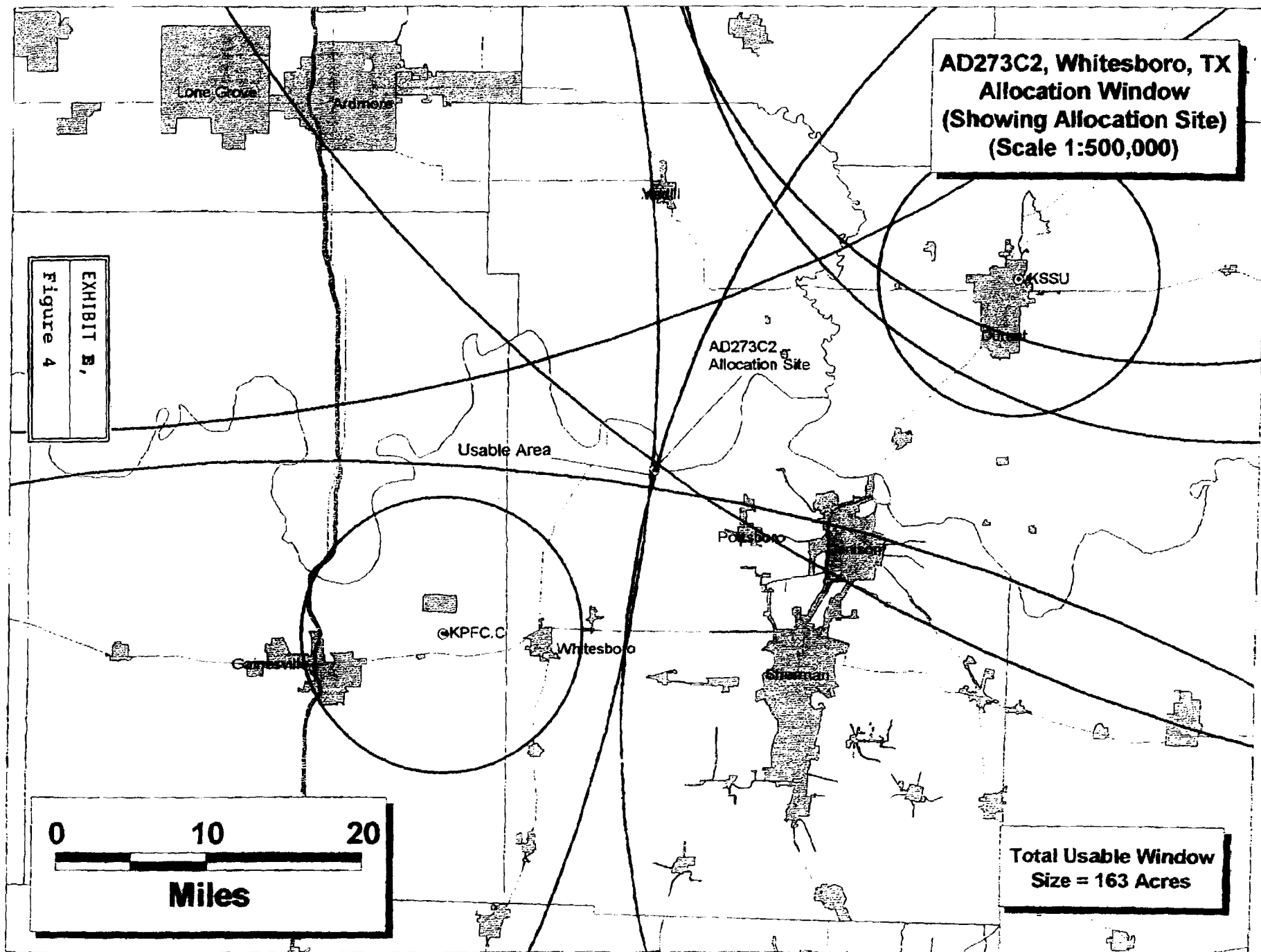


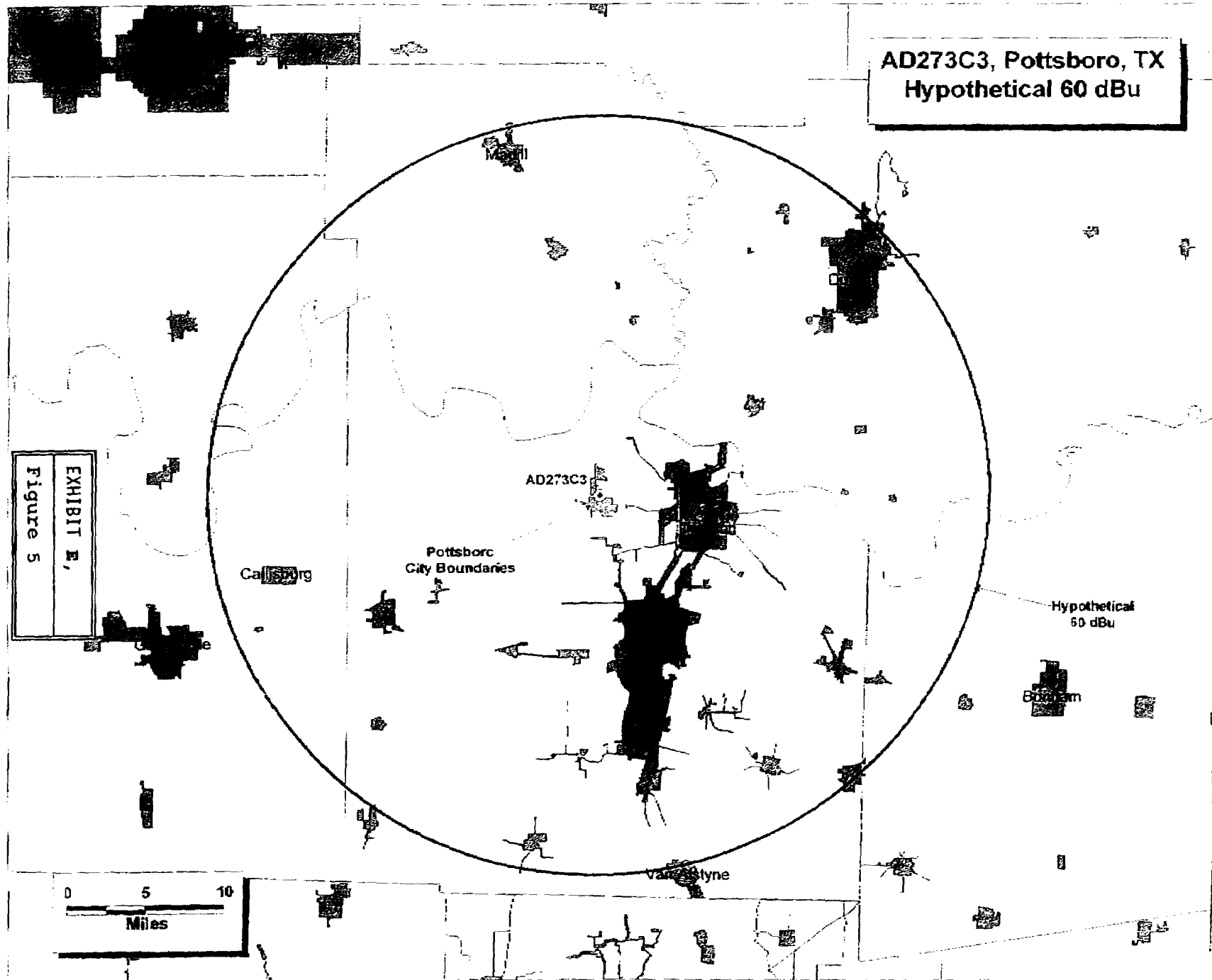
EXHIBIT B,
Figure 3

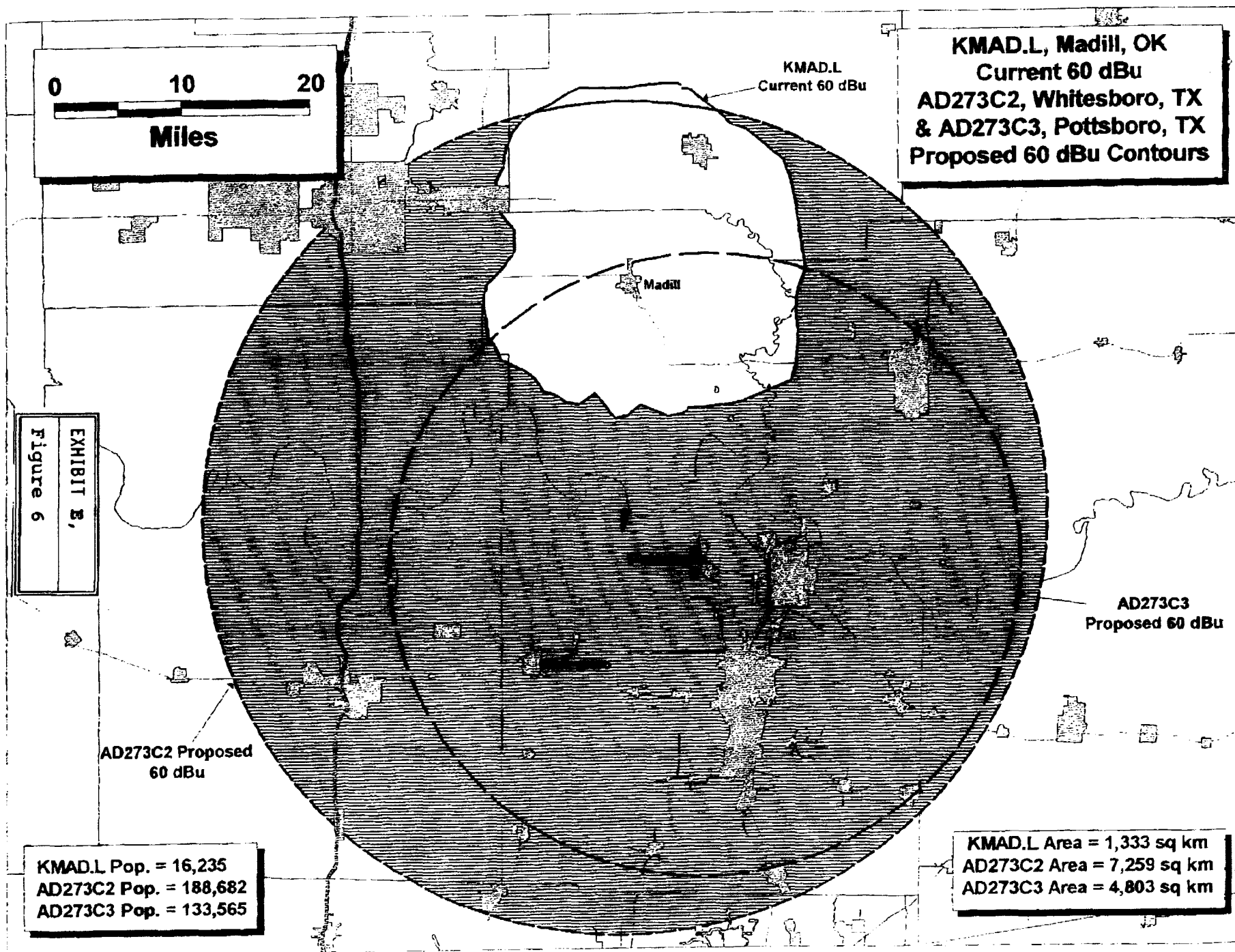
P.R.C.

MO40022940

P.10







ENGINEERING STATEMENT**In Support of a
COUNTERPROPOSAL**

Pottsboro, Texas

MM Docket 98-63, RM-9209

Robert S. Sullins

AD 243A ALLOCATION STUDY**[DEPICTING CLEAR SPACING AT A REFERENCE SITE WHICH PROVIDES THE
REQUIRED 70 dBu SERVICE TO 100% OF SOPER]**

34 01 56 N.

95 45 55 W.

Class A

Search Date

Current rules spacings

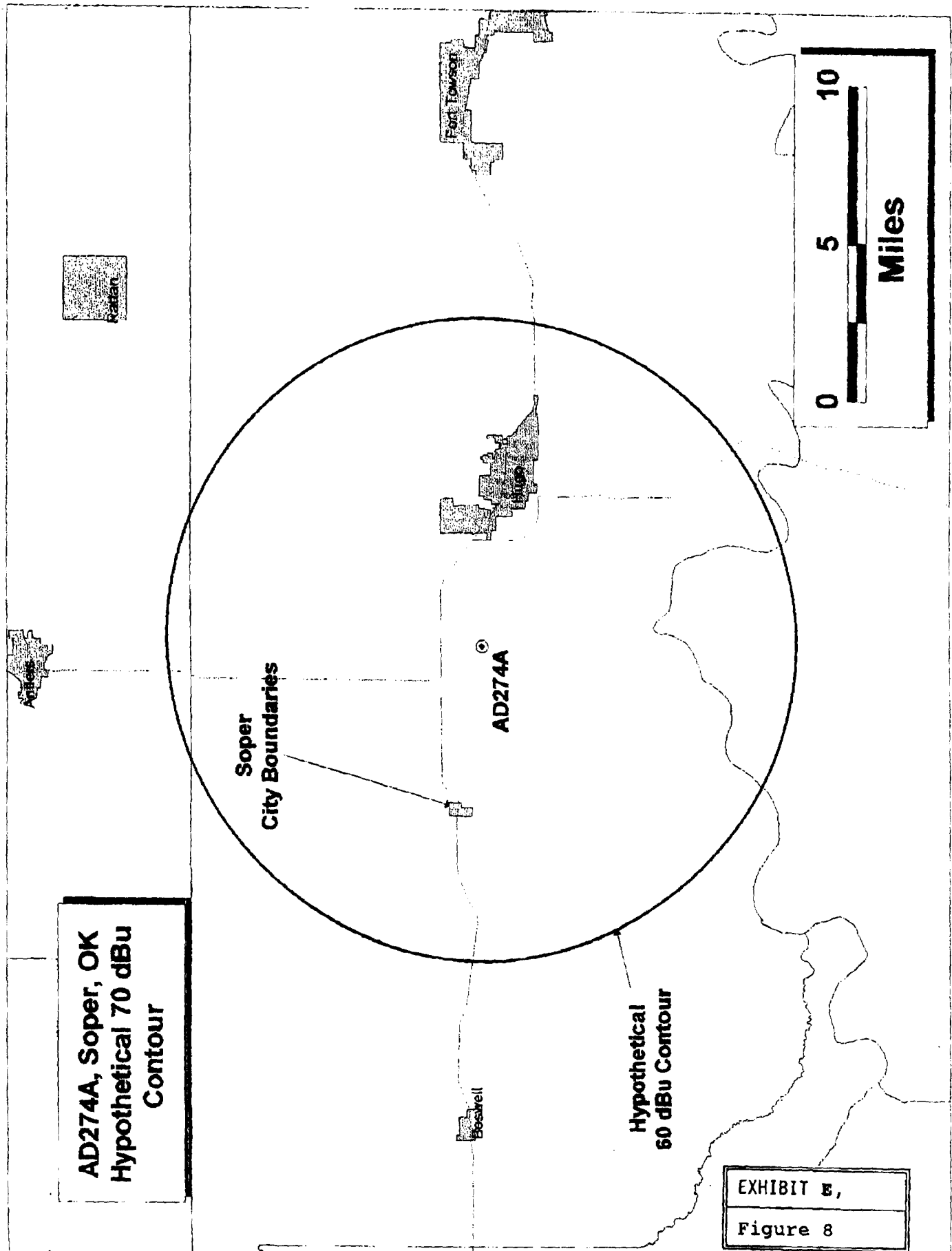
06-24-98

Channel 243 - 96.5 MHz

Call	Ch#	City	State	Bear'	Dist'	R'qrd	Margin
Community of Soper			OK	90.0	6.34		
Reference Coordinates:							
North Latitude: 34-01-56							
West Longitude: 95-41-48							
KBELFM	244C3	Idabel	OK	100.8	89.01	89.0	0.01 *
KNKI.C	244C	Flower Mound	TX	247.5	172.48	165.0	7.48 *
KNKI.C	244A	Sherman	TX	243.8	82.78	72.0	10.78
KNKI	244A	Sherman	TX	243.8	82.78	72.0	10.78
KRAV	243C	Tulsa	OK	352.8	241.97	226.0	15.97
KSCS	242C	Fort Worth	TX	214.9	195.41	165.0	30.41
KVKIFM	243C1	Shreveport	LA	132.0	238.54	200.0	38.54
KMMY	246C	Muskogee	OK	12.7	142.42	95.0	47.42
DE296	296C3	Durant	OK	266.8	60.75	12.0	48.75
KTTG	242C1	Mena	AR	66.5	182.82	133.0	49.82

EXHIBIT E,

Figure 7



ENGINEERING STATEMENT

In Support of a COUNTERPROPOSAL

Pottsboro, Texas

MM Docket 98-63, RM-9209

Robert S. Sullins

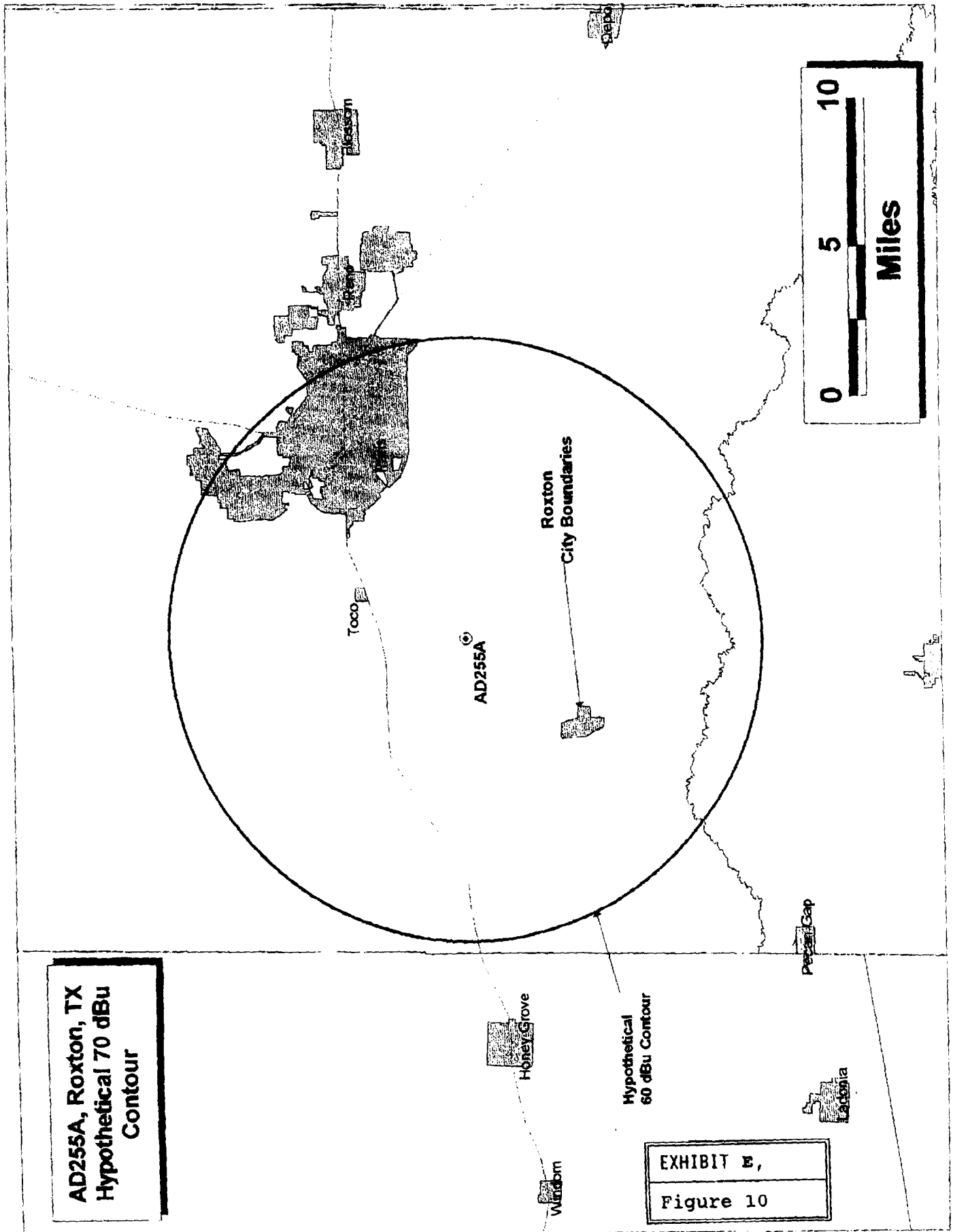
CH 255A ALLOCATION STUDY

[DEPICTING CLEAR SPACING AT A REFERENCE SITE WHICH PROVIDES THE
REQUIRED 70 dBu SERVICE TO 100% OF ROXTON]

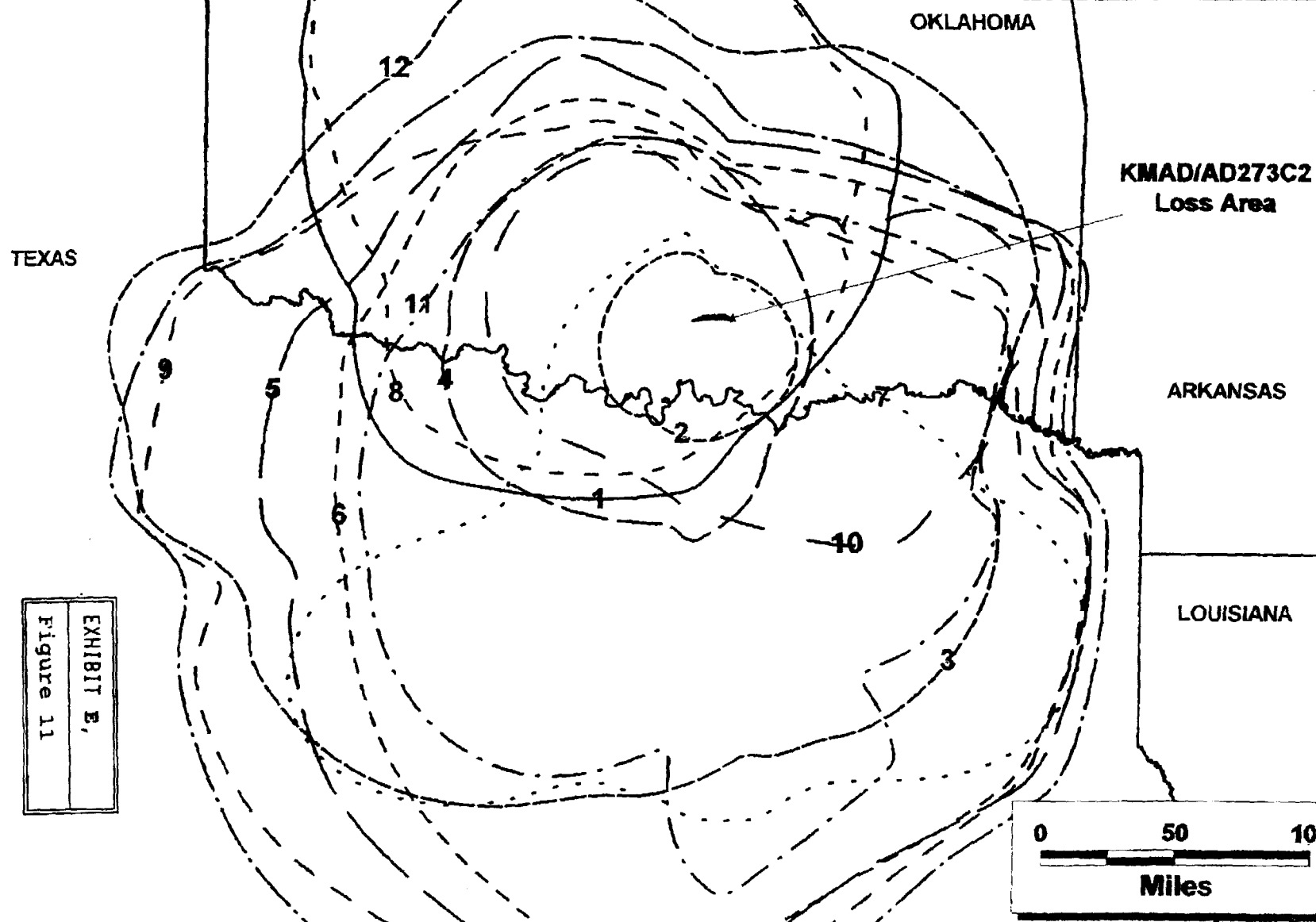
33 36 08 N.				Class A			Search Date
95 40 29 W.				Current rules spacings			06-24-98
			Channel	255 - 98.9 MHz			
Call	Ch#	City	State	Bear'	Dist'	R'qrd	Margin
Community of Roxton			TX	216.5	7.81		
Reference Coordinates:							
North Latitude: 33-32-44							
West Longitude: 95-43-29							
AD255	255A	Roxton	TX	0.0	0.00	115.0	-115.00 *
Of No Concern							
Allotment Proposed as Substitution							
for CH 274A in Previous							
NPRM (MM Docket 98-7)							
KLUVFM	254C	Dallas	TX	227.1	165.00	165.0	0.00 *
KTUX	255C1	Carthage	TX	131.0	205.05	200.0	5.05 *
KGAP	253C2	Clarksville	TX	88.9	61.01	55.0	6.01 *
KFYZFM	252C3	Bonham	TX	264.1	51.21	42.0	9.21 *
KHCK	256C	Denton	TX	262.3	177.21	165.0	12.21
KFYZFM	252C3	Bonham	TX	272.4	61.25	42.0	19.25
KMAG	256C	Fort Smith	AR	29.3	187.16	165.0	22.16
KYIS	255C	Oklahoma City	OK	322.6	273.43	226.0	47.43
KPLX.A	258C	Fort Worth	TX	239.2	142.63	95.0	47.63

EXHIBIT E,

Figure 9



**AD273C2, Whitesboro, TX
Remaining Services Study**

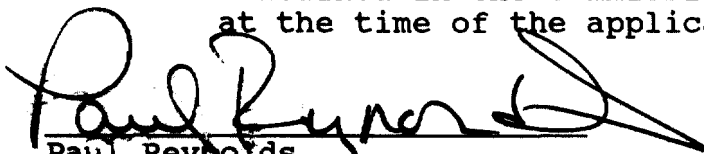


ENGINEERING CERTIFICATION

STATE OF ALABAMA)
)
BUTLER COUNTY)

Paul Reynolds declares the following:

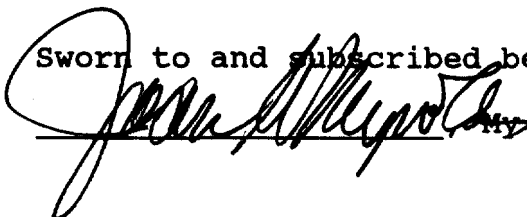
- * That he has completed undergraduate studies in the field of communications at the University of Southern Mississippi.
- * That he has completed course requirements for a Masters Degree in communications at the University of Alabama.
- * That he has completed basic electronics at DeVry Technical Institute.
- * That he has been operating as an independent communications consultant since 1980.
- * That he is familiar with the Commission's Rules and Regulations.
- * That the engineering for the instant Robert S. Sullins Counterproposal in MM Docket 98-63, RM-9209 was prepared by him or under his direct supervision.
- * That all information presented is believed to be true and correct and in full compliance of the technical standards contained in the Commission's Rules and Regulations in affect at the time of the applicant's filing date.


Paul Reynolds

REYNOLDS TECHNICAL ASSOCIATES
301 Cedar Street Suite 4
Greenville, AL 36037

(334) 382-3239

Sworn to and subscribed before, this 27th day of June, 1998.

 My commission expires 7-15-2000

WHITESBORO, TEXAS



1996 COMMUNITY PROFILE



Lone Star Gas Company

LOCATION

Distance in miles from:

Dallas	55	Chicago	856
Houston	307	Los Angeles	1,388
Denver	738	New York	1,533

POPULATION

	City	County
1995	3,290	96,294
1990	3,267	95,021
1980	3,127	89,796
1970	2,927	83,225

WORKFORCE

Wage rates for manufacturing occupations:

Occupation/ Job Title	Entry	Average
Production Assembler	\$4.25	\$5.03
Tool and Die Maker	\$6.20	\$8.24
Machinist	\$6.20	\$7.21
Drill or Punch Press	\$5.15	\$6.20
Secretary	\$5.65	\$6.70
Shipping Clerk	\$4.64	\$5.15
Forklift Operator	\$5.25	\$6.75
Welder	\$5.65	\$6.20

County

Labor Force	47,634
Unemployment	2,522
% Unemployment	5.3
Total Employment	45,112

TRANSPORTATION

HIGHWAYS

Distance to Nearest Interstate: 15 miles
 Highways Serving City: 3
 Federal: 82 State: 56, 377
 Interstate: 35

COMMON CARRIERS

Interstate Carriers: 6
 Intrastate Carriers: 4
 Number of Local Terminals: N/A
 Highway Bus Service: 15 miles (Sherman, Gainesville)
 Overnight Courier Service: Yes

AIR SERVICE

Location: Gainesville Municipal - Grayson
 Sherman County
 Runway Length: 7,000 feet
 Surface: Concrete Lighting: Yes
 Instrument Landing System: Yes
 Taxi or Car Rental: Yes, taxi

Nearest Commercial Service: Dallas/Ft.
 Worth International/Dallas Love Field
 Airlines Serving: American, Delta,
 Northwest, United/Southwest (Love Field)
 Daily Flights: 2,000
 Arrivals: 1,000 Departures: 1,000

RAILROADS

Served by: Union Pacific
 Piggyback Ramp: No
 Interchange Point: Yes

TRANSIT TIME

Transit time for carload or truckload lots to:

City	Days By Railroad	Days By Motor Freight
Atlanta	6	3
Chicago	4	3
Dallas	1	1
Denver	3	3
Kansas City	2	3
Los Angeles	5	5
Seattle	3	5
New York	7	4
St. Louis	2	3
Houston	2	2
New Orleans	3	2
Phoenix	4	3

TAX STRUCTURE

Tax Rate (\$ per \$100 of appraised value):

City	0.50500
County	0.45179
School	1.39000
Other	<u>0.10115</u>
Total	2.44794

COMMUNICATIONS

Type of Newspaper(s) in City: Weekly
Radio Stations in Area: 4
TV Channels without Cable: 7
Cable Television: Yes
Number of Channels: 38

INCENTIVES

Tax Abatement: Available for
Qualified Business

Enterprise Zone: No

Industrial Foundation: Yes

Other: Performance Grant for
Qualified Businesses

EDUCATION

State Industrial Job Training Available: Yes

Public School Budget: \$6,343,245

Average SAT Score: 1,015

Average ACT Score: 19.9

	Schools	Enrollment	Student/ Teacher Ratio
Elementary	1	550	22:1
Middle/Jr High	1	461	22:1
Senior High	1	372	22:1
Private	1	50	12:1
Voc-Tech			
Colleges			
Libraries	1	Volumes: 22,729	

Area Universities/Colleges: North Central Texas
College, University of North Texas, Texas Women's
University, Austin College, Univ. of Texas Southwestern
Medical School and Grayson County College

**INDUSTRIAL SUPPORT
SERVICES**

Service	Distance	Town
Tool and Die	14	Gainesville
Heat Treating	14	Gainesville
Electric Motor Repair	Local	
Heavy Hardware	Local	
Welding Supplies	14	Gainesville
Corrugated Containers	26	Denton
Solid Waste Disposal	Local	
Materials Recycling	Local	

COMMUNITY FEATURES

GOVERNMENT

Government (type): Council-City Manager
Planning Commission: Yes
Zoning Regulations: Yes
Policemen: 7 **Cars:** 6
Firemen Paid: 0 **Volunteer:** 28
Local Insurance Key Rate: 17

CHURCHES

Protestant: 20 **Catholic:** 1
Jewish: 0 **Other:** 0

RECREATION

Parks: 5 **Golf Courses:** 3 (15 miles)
Public Swimming Pools: 1
Country Clubs: 0 **Theatres:** 0
Tennis Courts: 4 **Restaurants:** 10
Hotels & Motels: 1 **Total Rooms:** 30
Largest Meeting Room Capacity: 700
Other: Lake Ray Roberts, Lake Texoma,
Whitesboro Community Center, Bed and
Breakfast (1).

FINANCE

Banks: 3
Combined Assets: \$147,850,600
Savings and Loan Assns: 0
Combined Assets: N/A

HEALTH CARE

Hospitals: 0 **Beds:** 0
Clinics: 4
Doctors: 4 **Dentists:** 2
Nursing Homes: 1 **Beds:** 100

CLIMATE

Annual Avg Temp: 65 degrees
Monthly Avg High Temp: Jan 44; July 87
Monthly Avg Low Temp: Jan 32; July 76
Annual Avg Precipitation: 29.2 inches
Annual Avg Snowfall: 6 inches
Elevation: 840 feet

UTILITIES

NATURAL GAS

Gas Supplier: Lone Star Gas Company,
diversified transmission & distribution co.
BTU Content per Cubic Foot: 1,030

ELECTRICITY

Electric Power System: City of Whitesboro
Reserve Generating Capacity: 3.5 MGW
KW Peak Demand: 8,000

WATER

Water Supplied by: Municipal
Name of Supplier: City of Whitesboro
Source of City Water: Wells
Capacity of Water Plant: 2.23 MGD
Average Consumption: .5 MGD
Peak Consumption: .8 MGD
Storage Capacity: 978,000 gals

SEWAGE TREATMENT

Type of Treatment: Activated
Sludge/Trickling Filter Process
Capacity: .45 MGD
Current Usage: .4 MGD

TELEPHONE

Name of System(s): GTE
Digital Switching: GTD-5
Special Features: All custom calling
features

MISCELLANEOUS

Government Installations:

<u>Installation</u>	<u>Employment</u>
U. S. Postal Service	13
City of Whitesboro	100

MAJOR AREA EMPLOYERS

FIRM NAME	PRODUCT	EMPLOYEES	UNION AFFILIATION
Bank of America	Finance	5	None
Boaz Heating & Air	Plumbing/AC	18	None
Brown Real Estate	Real Estate	8	None
Cedar Mills Marina	Sailboat Manufactor	63	None
Children's Tree	Daycare/Education	22	None
City of Whitesboro	Government	100	None
Clinnon's Grocery	Grocery	25	None
Culpepper Plumbing/AC	Plumbing/AC	14	None
David's Grocery	Grocery	15	None
Foxworth Galbraith	Building Material	27	None
Holiday Chevrolet	Auto	18	None
Independent School Dist.	Education	150	None
Lovejoy's Cutting Room	Apparal	23	None
Medical Plaza Home Health	Health Care	15	None
Raney Ford	Auto	7	None
Redi-Mix Concrete	Concrete Service	15	None
Security Bank	Finance	27	None
Surety Bank	Finance	15	None
TCI Cablevision	Cable Service	42	None
Texaco Inc.	Gas Process	10	None
Thousand Trails	Recreation	11	None
Whitesboro News Record	Newspaper	7	None
Whitesboro Nursing Home	Health Care	70	None

FOR FURTHER INFORMATION CONTACT:

Contact Name: Janis Crawley, Executive Vice President
Address: 107 W. Main
 P. O. Box 522
 Whitesboro, TX 76273
Telephone Number: (903) 564-3331



Lone Star Gas Company
Economic Development
 301 S. Harwood, 619N
 Dallas, Texas 75201
Phone: (800) 880-7181
FAX: (214) 573-3801



Whitesboro Parks & Facilities

Center Street Park

Located at the north end of Center Street, this park has a playground, picnic areas, two youth baseball fields, and a basketball court.

Field of Dreams

The Field of Dreams Complex is located at Fourth Street and Hwy 82 West. There is one regulation baseball field and one regulation softball field at this site. In addition, there are restroom facilities and a concession stand.

Godwin Park

Godwin Park is located on Wilson Street. There is a one-half mile walking trail, exercise stations, pavilion, playground, BBQ and picnic areas.

Sunset Park

Located at Sunset and Abney Streets, this park has three baseball/softball fields, two tennis courts, and a basketball goal. There are also restroom facilities and a concession stand.

Trollinger Park

This park is located at Trollinger Avenue and East Main Street. It has a pavilion, playground, BBQ and picnic areas, and a basketball court.

Tot Lot Park

Tot Lot Park is located at Chestnut and Walnut Street. There is a youth baseball practice field, a basketball court, playground, and picnic areas.

J. O. Rector Community Center & Driving Range

The community center, complete with game room, meeting rooms, kitchen, and assembly room is available for rental. A golf driving range is located next to the center. Players must bring their own balls and clubs.

Whitesboro City Officials

Alfred C. Miller.....Mayor
Charles Whitecotton...City Administrator
Penny Renfroe...Dir. Parks & Recreation

Whitesboro City Council

Mark Pike
Mike Allred
Murriel Gilbreath
Jim Keller
Steve Culpepper

Parks & Recreation Advisory Board

Doris Haynie, Chairman
Greg Miles
Dale Busbice
Linda Williams
Brian Parish

Parks & Recreation Staff

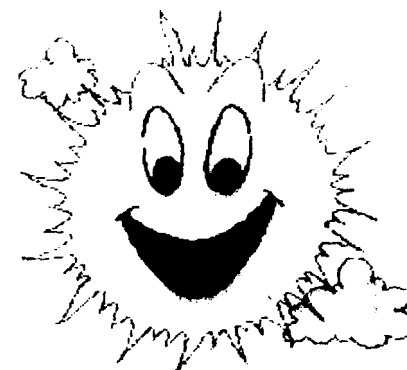
Director.....Penny Renfroe
Administrative Assistant.....Charla Carman
Athletic Supervisor.....Dare Nolan
Athletic Assistant.....Jana Hawkins
Athletic Fields Maintenance Asst.....Lloyd Woody
Custodian.....Billie Rae Montana
Parks Supervisor.....Dennis Green
Parks Maintenance Worker.....Gary Darnell
Building Supervisor.....Jackie Walton

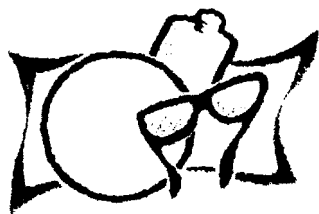
**BUILDING RENTAL OPEN TO
GROUPS AND ORGANIZATIONS**
Call the Center at (903) 564-5964

PASS IT ON!

After you've chosen the classes you wish to take, pass your brochure on to a friend or recycle.

Whitesboro Parks & Recreation Department





SWIMMING POOL LOCATION

The pool is located at 400 North Wilson Street, Whitesboro and operates May through August.

HOURS OF OPERATION

Monday, Tuesday, Thursday, and
Friday--1:00 to 7:00 PM
Wednesday--2:00 to 7:00 PM
Saturday--1:00 to 6:00 PM
Sunday--1:00 to 5:00 PM

FEES

Admission is \$1.00 per person
(children two years and younger are
free.)

Individual Pass--\$40.00
Family Pass--\$60.00 for a family of
four

SWIM LESSONS

Swimming lessons are conducted in
the mornings at 9:00, 10:00, and
11:00 AM in June and July.
The lessons run in two week sessions
and cost \$17.00 per person.

JIMMIE O. RECTOR COMMUNITY CENTER

The Jimmie O. Rector Community Center has an assembly room, full kitchen, meeting rooms, a stage, and a gameroom. The center is available for rent for family reunions, parties, business meetings, seminars, and large gatherings of all kinds. For more information on renting the center, please call (903)564-5964.

CLASSES/PROGRAMS

The Whitesboro PARD offers a variety of classes, seminars, and programs for people of all ages. Classes in karate, CPR, sign language, and baby-sitter training are among those offered by the department.

On-going programs such as indoor walking, gameroom tournaments, little bakers, and street hockey are offered. Special events include middle school dances, bicycle safety, and drug awareness seminars.



SPORTS

YOUTH RECREATIONAL LEAGUES

The PARD sponsors three recreational sporting leagues for the youth of the area:

soccer (4 to 9 year olds),
basketball (8 to 11 year olds), and
baseball/softball (5 to 12 year olds).
The participation fee for each sport is
\$25.00 per player.

A general calendar of seasons is
listed:

Soccer--Registration--August
Season--September and October
Basketball--Registration--November
Season--December to February
Baseball/Softball--Registration--March
Season--April to June

YOUTH COMPETITIVE LEAGUES

The PARD sponsors competitive leagues in addition to its recreational leagues. These include football (5th and 6th graders), basketball (5th and 6th graders), and baseball (13 to 18 year olds).

For more information concerning sports, call the PARD sports line at
(903)564-9301.

ADULT SPORTS

The PARD sponsors a men's open basketball league for interested team in the Texoma area. The league begins play in February and continue through April.

An adult co-ed softball league holds its games in Whitesboro at the Field of Dreams. This league plays its games in July and August. A sand volleyball league is pending with games to be held at Godwin Park during the summer months.



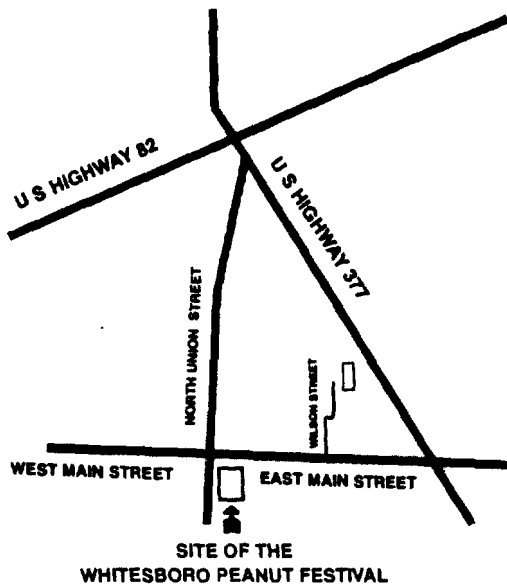
SENIOR CITIZEN ACTIVITY CLUB

The Whitesboro Senior Citizen Activity Club holds a dance on the fourth Friday of each month from 7:00 to 10:00 PM at the Jimmie O. Rector Community Center. Informal dances are held every Thursday afternoon from 1:00 to 3:30 PM.

**WHITESBORO
AREA
CHAMBER OF COMMERCE**

**ANNUAL
PEANUT FESTIVAL**

3rd Saturday every October



ANNUAL PEANUT FESTIVAL

The Peanut Farmer is very important to the Whitesboro Area economy. In 1965, The Chamber volunteers set aside the 3rd Saturday in October to honor their hard work and dedication. Their hard work is awarded on this day by promoting the sale of Peanut products and promoting the downtown Whitesboro area.

The Peanut Festival is sponsored each year by the Whitesboro Area Chamber of Commerce. This is a day for the entire family . . . for the entire community. Something is available to interest everyone. Some unusual activities have been implemented to promote involvement and participation from all ages.

The Festival is held downtown Whitesboro, Texas. For more information contact the Whitesboro Area Chamber of Commerce, P. O. Box 522, Whitesboro, Texas 76273 or (903) 564-3331.

Courtesy of

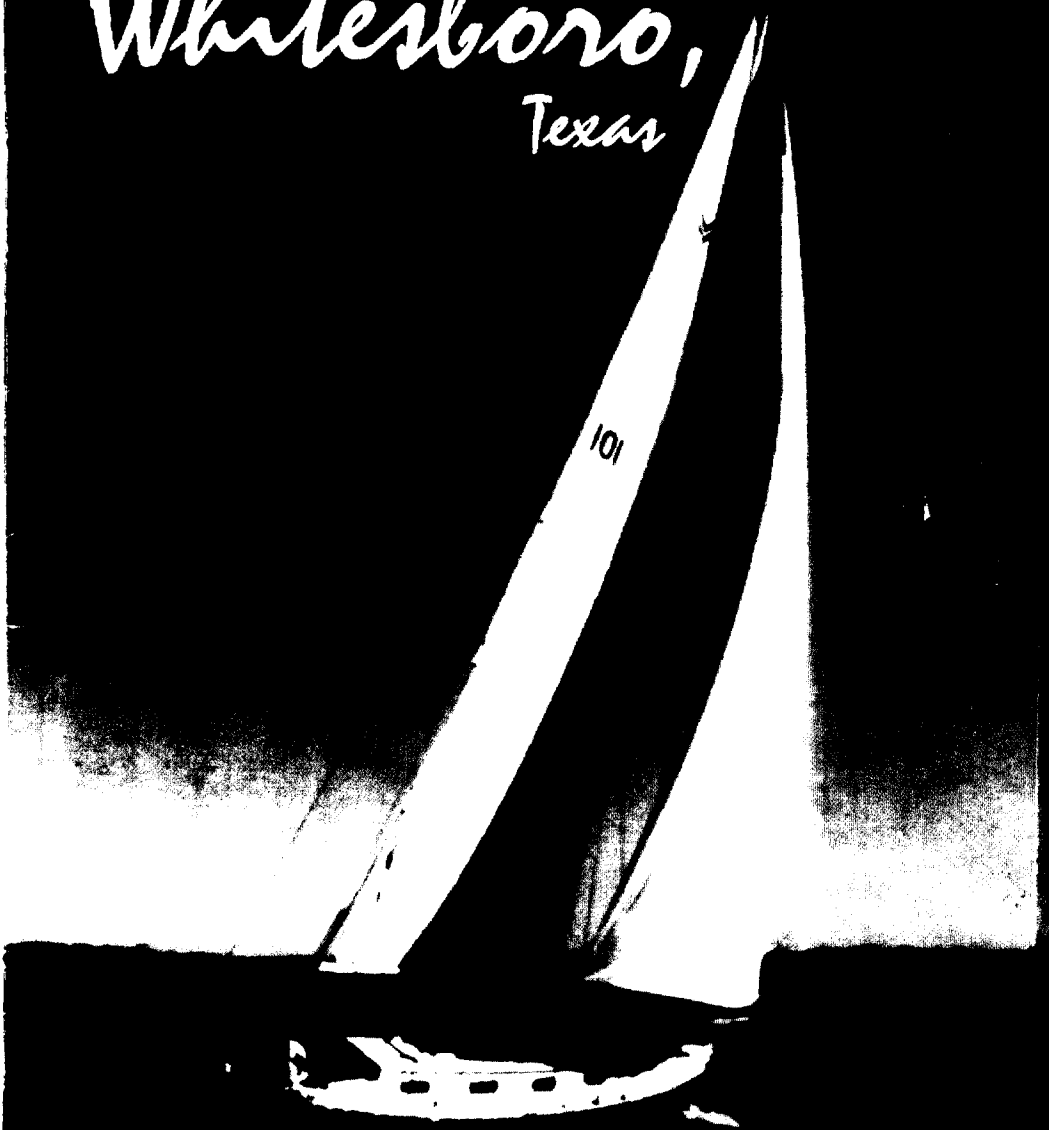
GTE



**HELD 3RD SATURDAY EVERY
OCTOBER IN DOWNTOWN
WHITESBORO, TEXAS
SINCE 1965**

The Festival is a local tribute
to our Peanut Farmers, peanuts have been
growing in our area since the mid 30's.

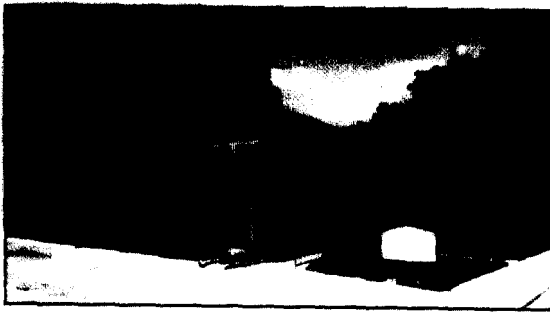
Whitesboro, Texas



WHITESBORO AREA CHAMBER OF COMMERCE
1996-1997 BUSINESS REFERRAL GUIDE



*The
Law Office*



of
Richard M. Barron

• *Real Estate Closing Services* •

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Wills • Trusts • Estate Planning

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Bad Faith Credit Reporting & Bill Collections

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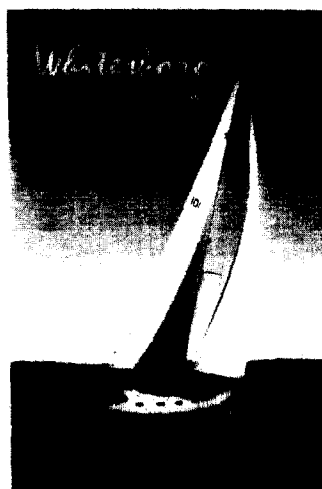
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get ahead to the good life
WHITESBORO
T E X A S

1996-1997
MEMBERSHIP DIRECTORY



CONTENTS

Chamber Officers	2
Historic Whitesboro	3
Schools	4
Guide To The Good Life	6
Peanut Festival	8
Demographics	10
Recreation	11
Area Map	12
Alphabetical Listing of Members	13
Classified Listing of Members	24
Advertisers' Index	32

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